

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

3. Without admitting plaintiff's *Monell* allegations in his First Amended Complaint, the City of Chicago agrees to entry of judgment against the City for compensatory damages and costs under FRCP 54(d), and, to the extent allowed by the court, other reasonable attorneys fees and costs pursuant to 42 U.S.C. § 1988, if the finder of fact in this case finds that any City employee violated plaintiff's constitutional rights as alleged in his First Amended Complaint. By this agreement, the City preserves its right to make post-trial motions and/or appeal consistent with this stipulation.

4. Further, if the finder of fact in this case finds that any City employee violated plaintiff's constitutional rights as alleged in his First Amended Complaint, plaintiff will not proceed with any additional litigation regarding plaintiff's *Monell* claims as contained in his First Amended Complaint.

AGREED TO BY:

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